DOCKET FILE COPY ORIGINAL RECEIVED

Before the FEDERAL COMMUNICATIONS COMMISSION APR 1 5 2004 Washington, DC 20554

In the Matter of)		OFFICE OF THE SECRETARY
Filing and Review of Open	•)	CC Docket No. 88-2
Network Architecture Plans)	

APRIL 15, 2004 ANNUAL ONA REPORT OF QWEST CORPORATION

I. INTRODUCTION

As part of the Federal Communications Commission's ("Commission") ongoing Open Network Architecture ("ONA") proceedings, the Commission has imposed certain reporting requirements on the former Bell Operating Companies ("BOC").

In the <u>BOC ONA Further Amendment Order</u>, the Commission included an Appendix B, in which it stated -- in a summary fashion -- the requirements for BOC April 15 annual filings.² For ease of the Commission's reference, Qwest Corporation ("Qwest")³, has chosen to follow the outline in Appendix B in providing its responses.

No. of Copies rec'd 0+4 List ABCDE

In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 6 FCC Rcd. 7646, 7649-50 ¶ 4, n.8 (1991) ("BOC ONA Further Amendment Order," appeal dismissed sub nom. MCI v. FCC, No. 92-70189 (9th Cir. Dec. 13, 1993); and Memorandum Opinion and Order on Reconsideration, 8 FCC Rcd. 97, 100-01 ¶ 18 (1993) ("OSS Order"); In the Matter of Revision of ARMIS USOA Report (FCC Report 43-02) for Tier 1 Telephone Companies and Annual Report Form M, Memorandum Opinion and Order, 8 FCC Rcd. 2535, 2536 ¶ 10 (1993) ("Network Evolution Order").

² This format was originally suggested with regard to BOC ONA Plan Amendments due April 15, 1992. See BOC ONA Further Amendment Order, 6 FCC Rcd. at 7649-50 ¶ 4, n.8, 7677-79, Appendix B.

³ On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc. ("U S WEST"), merged with and into Qwest Communications International Inc. Further, on July

II. COMMISSION REPORTING REQUIREMENTS⁴

The Commission requires each BOC to report on the following, initially by April 15, 1992, and on or before April 15 annually thereafter:

Requirement:

"(1) Annual projected deployment schedules for its ONA services by type of ONA service (BSA [Basic Service Arrangement], BSE [Basic Service Element], CNS [Complementary Network Service], or ANS [Ancillary Network Service]) in terms of percentage of access lines served system-wide and by market-area." The April 15, 2004 Report is to provide deployment schedules as of December 31, 2003, as well as projected deployment schedules as of December 31, 2004, December 31, 2005, and December 31, 2006.

Response:

The deployment schedules for ONA Services accompany the instant filing, attached hereto as Appendix A.

Requirement:

^{6,2000,} U S WEST Communications, Inc. was renamed Qwest Corporation. All references to U S WEST should be read as Qwest.

In response to the Commission's Further Notice of Proposed Rulemaking seeking comment on the elimination of some or all ONA reporting requirements, U S WEST proposed that the semi-annual reports and the Annual Report be consolidated into a new Annual ONA Report. In the Matter of Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services, 1998 Biennial Regulatory Review -- Review of Computer III and ONA Safeguards and Requirements, Further Notice of Proposed Rulemaking, 13 FCC Rcd. 6040, 6094-95 ¶¶ 101-2 (1998). The new Annual ONA Report would encompass all of the existing requirements of the semi-annual reports and streamlined information contained in its current ONA Annual Report. U S WEST proposed that the Commission retain Requirements (1), (2) and (6) and modified versions of Requirements (4) and (5). U S WEST proposed eliminating Requirements (3), (7), (8), (9), (10) and (11). U S WEST Comments filed Mar. 27, 1998.

⁵ See BOC ONA Further Amendment Order, 6 FCC Rcd. at 7677, Appendix B; OSS Order, 8 FCC Rcd. at 100-1 ¶ 18.

"(2) New ONA service requests from ESPs [Enhanced Service Providers] and their disposition, and disposition of ONA service requests that have previously been designated for further evaluation."

Response:

Qwest herein reports on the disposition of the ONA service requests received through our 120-day process, using the following classifications:⁷

Category 1 -- Developed

The requested service has been developed and is available (or will be available upon tariff approval).

Category 2 -- Under Development

The requested service is under development, and will be available, generally within one year of response.

Category 3 -- Further Evaluation Planned

The requested service is not currently available (generally due to technological reasons), but conditions may develop which could change its status. The request will be reevaluated within a time frame specified in Qwest's response to the ESP. Qwest will also identify activities and milestones being pursued, if appropriate, to meet the request. Such activities might include formal and informal technical research, market research, etc.

Category 4 -- Pending Evaluation

The request is currently being evaluated within the 120-day request cycle.

⁶ See BOC ONA Further Amendment Order, 6 FCC Rcd. at 7677, Appendix B.

⁷ This classification model has been used in Qwest's Annual ONA Reports since 1993.

Category 5 -- No Further Activity Planned

The request cannot be met for the reason specified in Qwest's response to the ESP (e.g., not an ONA request), or the requesting party cancels the request or chooses no further activity at any time during the process.

Qwest has provided several requested services through the 120-day process. Following are the services that have been developed in order of year requested.

1990 Requests Developed

In 1990, one service was requested through the 120-day process that has been developed: Call Forwarding Notification on Call Forwarding Variable and Call Forwarding Busy Line. Qwest's April 15, 1994 Annual ONA Report stated that this request was met with updates to the existing Call Waiting service.

1991 Requests Developed

In 1991, services requested through the 120-day process that have been developed include: Prefix Screening for IntraLATA 800 Service, the ability to forward Call Forwarding Busy Line and Call Forwarding Don't Answer ("CFDA") to different telephone numbers, Answer Supervision on Line-Side Access in 1AESS and 5 ESS Offices, Message Desk SMDI (Simplified Message Desk Interface)

Expanded, and Customer Control of Ring Cycles on Call Forwarding Don't Answer.

Qwest's 1992 Report stated that Prefix Screening for IntraLATA 800 Service and the ability to forward Call Forwarding Busy Line and CFDA to different telephone numbers had been developed. In 1993, Qwest reported that Answer Supervision on Line Side Access in 1AESS and 5 ESS Offices had been developed. Qwest's 1995

Report stated that Message Desk (SMDI) Expanded had been developed. In 1998, Qwest reported that the request for Customer Control of Ring Cycles on CFDA, was partially responded to in 1997 through the introduction of Customer Programmable Ring Cycle ("CPRC").⁸ The 1991 request for CFDA was for <u>customer</u> control of the ring cycle. CPRC provides that control to ESPs on behalf of their customers.

1992 Requests Developed

In 1992, services requested through the 120-day process that have been developed include: Removal of local call blocking on hotel/motel trunks,
Simultaneous Voice/Data Service, Surrogate Client Number, Remote Access Make
Busy, DS1 for Shared Tenant Users, Access Arrangement with Automatic Number
Identification ("ANI") and "555-XXX" numbers, Interoffice SMDI and Message
Waiting Indication (or "MWI"), and MWI Visual using Frequency Shift Key ("FSK")
signaling. Qwest's 1993 Report stated that four of these services had been
developed: Removal of local call blocking on hotel/motel trunks, Simultaneous
Voice/Data Service, Surrogate Client Number, and Remote Access Make Busy. In
1995, Qwest reported that DS1 for Shared Tenant Users and Access Arrangement
with ANI and "555-XXX" numbers had been developed.

1993 Requests Developed

In 1993, services requested through the 120-day process that have been developed include: 1B+D and 0B+D options for Integrated Services Digital Network ("ISDN") Basic Rate Interface ("BRI"), the ability to transfer a called number on

 $^{^{8}}$ See U S WEST CEI Plan Amendments for Voice Messaging ("VMS") and Enhanced Facsimile

Direct Inward Dial ("DID") trunks, and Voice Dialing. Qwest's 1994 Report stated that 1B+D and 0B+D options for ISDN BRI and Voice Dialing had been developed. The ability to transfer a called number on DID trunks was tariffed in 1996 as 2-way DID trunks with Call Transfer.

1994 Requests Developed

In 1994, services requested through the 120-day process that have been developed include: MWI for multiple ESPs, 555 delivery to Operator without call completion, and Message Delivery Service Interoffice (or "MDSI") with DMS100 host switches and Message Delivery Service (or "MDS") with 10-digit calling and Called Number Identification. Qwest's 1995 Report stated that MWI for multiple ESPs was developed. In 1996, Qwest reported that 555 delivery to Operator without call completion was developed. MDS with 10-digit calling and Called Number Identification is now available in switches where 10-digit dialing is mandatory.

Through 1995, Qwest received an additional thirty-one requests for ONA services through the 120-day process. These are all in Category 5 -- No Further Activity Planned.

In 1999, Qwest responded to a 1998 request for Simultaneous Delivery of Caller ID to two different locations. Qwest advised the requestor that the service was not technically or cost feasible to develop. It is currently classified as Category

Services filed Oct. 14, 1997 and effective Dec. 18, 1997.

5 -- No Further Activity Planned. In 1999, no complete ESP request for new ONA services was received.

In 2000, Qwest received one request through the 120-day process. The capability requested was for Mechanized Systems for Call Forward Busy Line/Don't Answer and MWI on end-user lines. Qwest advised the requestor that the service was not technically or cost feasible to develop. It is currently classified as Category 5 -- No Further Activity Planned.

In 2001, Qwest did not receive any requests through the 120-day process. In 2002, Qwest did not receive any requests through the 120-day process.

In 2003, Qwest received two requests through the 120-day process. The capability requested was Message Delivery Service using SS7 messaging. Qwest advised the requestors that the service was not feasible from a technical or economic perspective. It is currently classified as Category 5 -- No Further Activity Planned.

⁹ Qwest has stated that "the following criteria are used to determine whether or not an ESP has proffered a 'complete' request: customer name, contact name, address, telephone number, and date of request; description of desired network capability and utility to ESP or its customer or both; clarification if service is a modification to an existing service; if desired capability exists in another BOC, name of BOC and name of service; desired feature operation; service which will be supported by a new capability (enhanced service offering/application), drawing/illustration of telephone network interaction with desired capability and enhanced service it supports; traffic characteristics of the feature; location life of feature (short/long-term solution); market demand estimates and whether a nondisclosure agreement is requested; location where a feature is desired (states, metropolitan area, wire centers)." See Qwest's Apr. 15, 2002 Annual ONA Report at 7 n.9; Qwest's Apr. 15, 2001 Annual ONA Report at 7 n.9; U S WEST's Apr. 15, 1998 Annual ONA Report at 2; U S WEST's Apr. 15, 1997 Annual Report at 2; U S WEST's Apr. 15, 1996 Annual ONA Report at 4; U S WEST's Apr. 15, 1995 Annual ONA Report at 4; U S WEST's Apr. 15, 1993 Annual ONA Report at 5; U S WEST's Apr. 15, 1994 Annual ONA Report at 10.

Requirement:

"(3) Those ONA service requests previously deemed technically infeasible, and their disposition." "

Response:

In this filing, Qwest provides an update of those ESP requests that had been deemed "Technically Infeasible" in the April 15, 2001 Qwest Annual ONA Report."

Forty-one requests continue to be categorized as "Technically Infeasible." The status of the forty-one original ONA service requests currently categorized as "Technically Infeasible" is provided as Appendix B to this filing.

Service requests showing the current status of "Remains Classified as Future" include both those that are "Technically Infeasible" as well as those that fail to meet other aspects of the four Commission-established criteria for ONA services, i.e., market demand, utility as perceived by ESPs, and technical and costing feasibility. Qwest continues to work with requesting ESPs, equipment manufacturers, and the Network Interconnectivity Interoperability Forum ("NIIF"), to meet those requests that satisfy the criteria for ONA services.

Requirement:

"(4) SS7, ISDN, and IN projected deployment in terms of percentage of access lines served system-wide and on a market-area basis. SS7 data should

¹⁰ BOC ONA Further Amendment Order, 6 FCC Rcd. at 7678, Appendix B.

¹¹ Id. at Appendix B.

¹² See In the Matters of Amendment of Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), Report and Order, 104 FCC 2d 958, 1065-66 ¶ 217 (1986) ("Phase I Order").

be reported by TR 317 and TR 394, ISDN data by BRI and PRI, and IN data by release number or other designation by type." ¹³

Response:

Included as Appendix C to this filing is Qwest's deployment report for SS7, ISDN, and IN technologies. This report reflects projected deployment of the percentage of access lines by market area and on a system-wide basis that will have access to SS7, ISDN, and IN technologies. This information is based on current Qwest plans, and reflects projected deployment as of December 31, 2004, December 31, 2005, and December 31, 2006. In addition, actual deployment figures as of December 31, 2003 are reported.

Requirement:

"(5) New ONA services available through SS7, ISDN, and IN, and plans to provide these services." "

Response:

IN: In 2003, Qwest did not deploy any new IN services.

SS7: In 2003, Qwest did not deploy any new SS7 ONA services.

ISDN: In 2003, Qwest did not deploy any new ISDN ONA services.

Requirement:

"(6) Progress on the efforts in the IILC [Information Industry Liaison Committee] on continuing activities for the implementation of service-specific and long-term uniformity issues."¹⁵

Response:

¹³ BOC ONA Further Amendment Order, 6 FCC Rcd. at 7678, Appendix B.

¹⁴ <u>Id.</u>

¹⁵ <u>Id.</u>

There are no remaining unresolved issues as of 1999.

Requirement:

"(7) Progress in providing billing information including BNA [Billing Name and Address], line-side CNI, or possible CNI alternatives, and call detail service to ESPs."¹⁶

Response:

The Commission finds in its <u>BOC ONA Further Amendment Order</u> that the BOCs have made progress in providing billing information services to ESPs, and also in working through the NIIF to define ESP needs for billing information.

However, the Commission requires the BOCs to continue to report progress in this area to assure that ESPs have access to billing information they need.

Qwest described in its previous Annual ONA Reports to the Commission, numerous and widely-available services offered by Qwest that provide information that ESPs might find useful to bill their customers. Available services that provide ESPs and other customer call-related information helpful for billing purposes include:

• <u>Caller Identification-Number</u> ("ICLID") provides the calling party's directory number at the time the call is received. This service requires that both the originating and terminating central office switches be equipped with and interconnected by SS7.

¹⁶ <u>Id.</u>

¹⁷ See U S WEST's Apr. 15, 1992 Annual ONA Report at 23-26; U S WEST's Apr. 15, 1993 Annual ONA Report at 16-17; U S WEST's Apr. 15, 1994 Annual ONA Report at 12-14; U S WEST's Apr. 15, 1995 Annual ONA Report at 11-13; U S WEST's Apr. 15, 1996 Annual ONA Report at 9-11; U S WEST's Apr. 15, 1997 Annual Report at 7-9; U S WEST's Apr. 15, 1998 Annual ONA Report at 7-10; and U S WEST's Apr. 15, 1999 Annual ONA Report at 7-10; U S WEST's Apr. 15, 2000 Annual ONA Report at 13-15; Qwest's Apr. 15, 2001 Annual ONA Report at 11-14; Qwest's Apr. 15, 2002 Annual ONA Report at 10-11.

- <u>Called Identification-Bulk</u> ("BCLID") provides the calling party's directory number at the time the call is received *via* a 1200-baud private line circuit. As with ICLID, this service requires that both the originating and terminating central office switches be equipped with and interconnected by SS7.
- <u>Calling Name Delivery</u> available to ISDN PRI subscribers, allows for the delivery of the calling party's name, as well as the calling party's number. The customer must have CPE that will display the calling name.
- Redirecting Name Delivery available to ISDN PRI subscribers, allows the name and number of the original caller and the last redirecting number to be displayed after a call has been redirected via a call forwarding feature. The customer must have CPE that will display the redirecting name and number.
- Message Delivery Service transmits calling number, called number, and the reason for forwarding a call (such as busy/don't answer) on forwarded intra-office calls. Call information is transmitted pertaining to all incoming calls to an ESP's multi-line hunt group through a SMDI data link (private line) between the central office switch and the ESP's premise.
- Message Delivery Service Interoffice provides the same call-related data as MDS, but on an interoffice basis using SS7 technology, rather than dedicated SMDI links from the ESP to each central office served.
- <u>ANI-Circuit Switched Trunkside Option 1/FG-B like</u> delivers the seven-digit billing number of the calling party *via* the equal access signaling protocol.
- <u>ANI-Circuit Switched Trunkside Option 3/FG-D like</u> delivers the 10-digit billing number of the calling party *via* the equal access signaling protocol.
- Network Access Service provides call detail from the originating office when a unique NXX code is dialed. Call detail currently includes calling and called number; message date and connect and disconnect time; and billing name, address and phone number. Call detail is delivered to the subscriber on paper or magnetic tape. Only intraLATA calls can be provided with call detail.
- <u>Access Service Billing Information</u> provides the subscriber with a data record of all calls made to its access port or telephone number. The

detail record will vary depending upon whether the call is made in a packet or circuit switch environment, and will be delivered on a magnetic tape.

- ANI Order Entry provides the ANI of the ESP client, along with the called number. This information is forwarded via a private line data link.
- <u>Billing Name and Address</u> ("BNA") is available to any telecommunications provider, including ESPs, and can be used only in conformity with 47 C.F.R. § 64.1201.

Requirement:

"(8) Progress in developing and implementing OSS services and ESP access to those services." 18

Response:

Qwest has described in previous filings a variety of services that meet customers' network management needs. ¹⁹ The services provide an array of network management capabilities. Services currently available that provide customers with network reconfiguration abilities or performance and traffic data include:

- Self-Healing Alternative Route Protection ("SHARP") provides alternate path diversity for DS1/DS3.
- Self-Healing Network Service ("SHNS") has self-healing capability and alternate routing *via* ring topology as standard features.

¹⁸ See BOC ONA Further Amendment Order, 6 FCC Rcd. at 7678, Appendix B.

¹⁹ See U S WEST's Apr. 15, 1992 Annual ONA Report at 27-30; U S WEST's Apr. 15, 1993 Annual ONA Report at 18-19; U S WEST's Apr. 15, 1994 Annual ONA Report at 14-16; U S WEST's Apr. 15, 1995 Annual ONA Report at 13-15; U S WEST's Apr. 15, 1996 Annual ONA Report at 11-13; U S WEST's Apr. 15, 1997 Annual ONA Report at 9-11; U S WEST's Apr. 15, 1998 Annual ONA Report at 10-11; U S WEST's Apr. 15, 2000 Annual ONA Report at 15-16; Qwest's Apr. 15, 2001 Annual ONA Report at 14-15; Qwest's Apr. 15, 2002 Annual ONA Report at 12.

- Command A Link allows customers to reconfigure and remotely manage their private line networks and is available on Analog Private Line, Digital Data Service and DS1/DS3 Private Line Service.
- Numerous Qwest Networking Services, such as Frame Relay and Switched Multi-Megabit Data Service ("SMDS"), which contain inherent performance monitoring elements as part of the service.
- Electronic bonding capability *via* a Mediated Access Gateway ("MEDIACC") that allows ESPs and others access to certain OSS capabilities, such as Trouble Administration ("TA").
- Centrex services which provide standard and optional features that can be added, deleted, and changed by the customer; and that provide call data on Centrex lines.

Requirement:

"(9) Progress on the uniform provision of OSS services."²⁰

Response:

Qwest has committed in previous filings to "continue to work with ESPs, ESP industry groups, and the former IILC, now the NIIF, to better define specific ESP needs/market demands and to work towards uniformity of product and operational standards" with regard to OSS development and deployment.²¹

Qwest continues to support and is actively involved in the development of industry standards for Electronic Bonding and Electronic Communication. Qwest is involved in the Telecommunications Industry Forum ("TCIF") on the Electronic

 $^{^{20}}$ See BOC ONA Further Amendment Order, 6 FCC Rcd. at 7678, Appendix B.

²¹ <u>See</u> U S WEST's Apr. 15, 1992 Annual ONA Report at 31; U S WEST's Apr. 15, 1993 Annual ONA Report at 20; U S WEST's Apr. 15, 1994 Annual ONA Report at 16-17; U S WEST's Apr. 15, 1995 Annual ONA Report at 15-16; U S WEST's Apr. 15, 1996 Annual ONA Report at 13-14; U S WEST's Apr. 15, 1997 Annual ONA Report at 11-12; U S WEST's Apr. 15, 1998 Annual ONA Report at 11-12; U S WEST's Apr. 15, 2000 Annual ONA Report at 16-17; Qwest's Apr. 15, 2001 Annual ONA Report at 15-16; Qwest's Apr. 15, 2002 Annual ONA Report at 13.

Data Interchange ("EDI"), Service Order, Telephone Billing Work Group and Bar Coding sub-committees. These committees establish industry guidelines and service order transactions standards for network telecommunications services.

Requirement:

"(10) List of BSEs used in the provision of BOC's own enhanced services."²²
Response:

Qwest is currently utilizing the following BSEs in the provisioning of its enhanced services:

<u>Audiotex Services:</u> Call Transfer, Called Directory Number Delivery ("CDND") (DID)²³ and Hunting.

Electronic Messaging Services: Access Service Billing Information, Alternate Traffic Routing, ANI (FG-B), ANI (FG-D), Backup/Redirection, Bridging, CDND (DID), Closed User Group, Closed User Group Incoming Access Barred (Packet), Closed User Group Outgoing Access Barred (Packet), Command A Link, DID Trunk Queuing and Basic Announcement, Fast Select Acceptance, Flow Control Parameters (Packet), Improved Transmission Performance, ISDN Calling Name Delivery, ISDN Redirecting Name Delivery, Interface Group 6, Logical Channel (Packet), Logical Channel Layout (Packet), Message Delivery Service, Message Delivery Service Interoffice, Modem Aggregation Service, Multiple Network Addresses (Packet), Multiple Port Hunt Group, Multiplexing, Nonstandard Window

²² BOC ONA Further Amendment Order, 6 FCC Rcd. at 7678, Appendix B.

²³ In some of our states, CDND is a BSE. In others, it is considered an integral component of the BSA, DID.

Size (Packet), Permanent Virtual Circuit (Packet), Reverse Charge Acceptance, Reverse Charge Option (Packet), and Uniform Call Distribution.

Enhanced Facsimile Services: Call Forwarding Busy Line, Call Forwarding Busy Line-Customer Programmable, Call Forwarding Busy Line/Don't Answer, Call Forwarding Busy Line-Expanded, CFDA, Call Forwarding/Don't Answer-Customer Programmable, Call Forwarding/Don't Answer-Expanded, Call Forwarding Variable, Call Forwarding Without Call Completion, CDND (DID), Hunting, Message Delivery Service, Message Delivery Service Interoffice, Private Line Conditioning and Remote Access Forwarding.

On-Line Database Access Services: Call Transfer, CDND (DID),
Hunting, ISDN Calling Name Delivery, ISDN Redirecting Name Delivery,
Message Delivery Service, Message Delivery Service Interoffice and Modem
Aggregation Service.

<u>Protocol Processing Services:</u> Access concentrators and Interoffice Channels.

Voice Messaging Services: Call Forwarding Busy Line/Don't Answer, CFDA, Call Forwarding Variable, Call Transfer, Command A Link, Market Expansion Line, Hunting, Message Delivery Service, Message Delivery Service Interoffice, Message Waiting Indication-Audible, Message Waiting Indication-Audible/Visual, Message Waiting Indication-Visual and Traffic Data Report Service.

Requirement:

"(11) Each BOC must file the first annual report on the unbundling of new technologies by July 15, 1993. Thereafter, each BOC must file this annual report by April 15 of each year with other annual reports required by the BOC ONA Further Amendment Order."²⁴

Response:

Qwest herein describes for the Commission its efforts with regard to the creation of services as a result of certain technologies which are of interest to the Commission.

IN: Qwest provides the following IN services: Custom Route, Select Call Routing, Remote Access Forwarding/Call Planner, Scheduled Forwarding, Call Forward by Calling Number, Paging Party Pays Announcements, Government Emergency Telecommunications Service, Call Data Collection and Transmission Service (CDCT), Continuous Redial Deluxe, Business Continuation Routing, Call Curfew, Dial Lock, No Solicitation, Do Not Disturb, IS-41 Location Routing Service, Wireless Extension, Privacy Plus, Number Forwarding, Qwest Call Queuing, Security Screen and Easy Access.

During 2003, Qwest actively participated in industry efforts to resolve various operational, technical and uniformity issues relating to unbundling of the IN network. Qwest actively participates with ATIS' Network Technical Committee ("NTC") and continues to support the NIIF as an appropriate forum for addressing technical, operational and standards issues.

²⁴ Network Evolution Order, 8 FCC Rcd. at 2608 ¶ 10.

SS7: Qwest provides the following SS7-based services: Message

Delivery Service Interoffice, Continuous Redial, Last Call Return, ICLID,

BCLID, Call Trace, Call Rejection, Selective Call Forwarding, Priority Call,

SS7 Out-of-Band Signaling, Common Channel Signal Access Capability and

Modem Aggregation Service.

ISDN: Qwest provides the following ISDN-based services: ISDN BRI,

ISDN PRI (PRS), ISDN Single Line Service, Circuit Switched Data PRS, a

data-only PRS option, Digital Data Service 2-Wire, RND, CNI, Calling Name

Delivery, Redirecting Name Delivery, and Service Profiler Identifier

("AutoSPID").

Information on ISDN can be obtained from Qwest's Internet web site,

http://www.qwest.com/products/data/isdn.

III. <u>CONCLUSION</u>

As set forth herein, Qwest's 2004 Annual ONA Report is responsive to all

Commission Requirements and Orders.

DATED:

April 15, 2004

17